Comments on WT Docket No. 05−235

Concerning Amendment of Part 97 Rules
governing the Amateur Radio Service

I reviewed the Notice of Proposed Rulemaking and Order 05−235, concerning the amendment of Part 97 Rules to eliminate the international Morse Code examination (Element 1) as a requirement for any class of Amateur Radio License. I do not believe that the Commission's stated purposes would be furthered by the abolition of the international Morse Code examination element.

Because the original Telegraph Code was developed in 1840, it is sometimes perceived that the mode is obsolete. However, because it is much simpler to design and build transmitting apparatus for the Radiotelegraph Code than for voice or other data modes, Morse Code transmitters or transceivers are often the first construction projects undertaken by amateur radio operators, and are useful in developing comprehension of how radio frequency circuits work. After gaining experience in the construction and testing of apparatus for the Morse Code, many amateurs then graduate to the construction and testing of apparatus for voice or other data modes. Elimination of the international Morse Code examination element will predictably lead to a reduction in the custom of amateurs gaining experience building their own apparatus at an introductory level.

The bandwidth occupied by a radiotelegraph code signal is significantly narrower than that occupied by the popular voice modes, and by most data modes. Operation with the Radiotelegraph Code therefore enables a large number of licensees to participate in activity on the limited High Frequency allocations possessed by the Amateur Radio Service, while limiting congestion; an important consideration for a service with nearly 700,000 licensees, in a frequency range in which both nationwide and worldwide communication is possible. Use of, and proficiency in, the narrowest bandwidth modes, such as the international Morse Code and PSK31, should be encouraged, both in the license examination elements required, and the operating privileges extended.

The international Morse Code (CW) is the second most widely used mode on the Amateur high frequency allocations. This can readily be seen by examining recent activity statistics from 'ARRL Field Day', an annual emergency preparedness exercise and the most popular on−the−air Amateur Radio activity in North America. This data indicates that the international Morse Code is a mainstream communications mode within the Amateur Radio service. During 'Field Day', the international Morse Code has been used for approximately 38−40% of completed contacts in recent years, and there does not appear to be a downward trend in it's popularity. It therefore seems reasonable to expect applicants seeking the highest level license within the Amateur Radio service to

demonstrate proficiency with the mainstream modes used.

ARRL Field Day Activity Statistics							
	CW		Phone		Digital		
Year	number	percent of total	number	percent of total	number	percent of total	Total
1995	514627	37.1%	871651	62.9%	–	0.0%	1386278
1996	471931	38.2%	762011	61.8%	–	0.0%	1233942
1997	495409	38.7%	783176	61.3%	–	0.0%	1278585
1998	490490	36.2%	855862	63.1%	9927	0.7%	1356279
1999	539567	36.6%	929023	63.0%	5994	0.4%	1474584
2000	511422	35.8%	906226	63.5%	10376	0.7%	1428024
2001	536072	37.8%	868174	61.2%	14283	1.0%	1418529
2002	537130	37.7%	869922	61.1%	17170	1.2%	1424222
2003	467748	41.5%	646564	57.4%	12525	1.1%	1126837
2004	517738	39.0%	787444	59.4%	20940	1.6%	1326122
2005	503205	41.3%	692722	56.9%	21766	1.8%	1217693

For these reasons, I believe that is is reasonable to retain the Element 1 international Morse Code examination element, at least for the Amateur Extra Class License.

Thank you for the opportunity to comment.

Respectfully Submitted,

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W5ESE